

REMARKS

The Office action has been carefully considered. The Office action rejected claims 1-7, 9-19, and 21-47 under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent No. 6,006,242 to Poole et al. ("Poole"). Further, the Office action rejected claims 8 and 20 under 35 U.S.C. § 103(a) as being unpatentable over Poole in view of U.S. Patent No. 6,085,220 to Courts et al. ("Courts"). Applicants respectfully disagree.

Applicants thank the Examiner for the interview held (by telephone) on March 12, 2004. During the interview, the Examiner and applicants' attorney discussed the claims with respect to the prior art. The essence of applicants' position is incorporated in the remarks below.

Prior to discussing reasons why applicants believe that the claims in this application are clearly allowable in view of the teachings of the cited and applied references, a brief description of the present invention is presented.

The present invention is directed, generally, towards behaviors of elements in a document, in which an encapsulated component (e.g., object), external to the document, is invoked to change the behavior (e.g., effects such as style, behavior, and/or display) of the associated element in the document. That is, the current content (elements) of the document may be modified by effects (behaviors). The associations between elements and external behavior components may be maintained in cascading style sheets, inline with the elements, and/or in various formats. When the document is provided to a renderer and the renderer parses the element in the document, the renderer accesses the associated external

component to modify a behavior of the page image, by running code such as script-based code.

Further, each behavior component is external to the document and its content. As a result, for example, a library of consistent, reusable behaviors may be defined and made available for use in designing and authoring many different web pages with different content. Similar to a library of functions, the same behavior component can be invoked as needed from different documents and interfaced with consistently, without requiring customization and so forth. Thus, not only may a single behavior may be shared among elements of a document, but a behavior component can be reused across other documents.

Note that the above description is for example and informational purposes only, and should not be used to interpret the claims, which are discussed below.

Turning to the claims, claim 1 recites a computer-readable medium having computer-executable instructions, comprising, receiving a document having an element thereon, the document including information associating the element with an external component that is encapsulated and external to the document such that the external component may be used with a different document, rendering a page image corresponding to at least part of the document, the page image including a representation of the element, and accessing the external component for determining a behavior of the representation of the element rendered on the page image.

The Office action rejected claim 1 as being unpatentable over Poole. The Office action contends that Poole teaches the recitations of claim 1 and

subsequently refers to the rejection of claim 17 for the specific references to Poole. The Office action recognizes that claim 1 contains additional recitations not in claim 17, but then contends that Poole teaches the additional recitations anyway. More specifically, the Office action contends that Poole teaches rendering a page image corresponding to at least part of the document, the page image including a representation of the element, and accessing the external component for determining a behavior of the representation of the element rendered on the page image. Column 65, line 50 to column 66, line 15 of Poole is referenced. Applicants respectfully disagree.

To establish *prima facie* obviousness of a claimed invention, all of the claim recitations must be taught or suggested by the prior art; (*In re Royka*, 490 F.2d 981, 180 USPQ 580 (CCPA 1974)), and “all words in a claim must be considered in judging the patentability of that claim against the prior art;” (*In re Wilson*, 424 F.2d 1382, 1385, 165 USPQ 494, 496 (CCPA 1970)). Further, if prior art, in any material respect teaches away from the claimed invention, the art cannot be used to support an obviousness rejection. *In re Geisler*, 116 F.3d 1465, 1471, 43 USPQ2d 1362, 1366 (Fed Cir. 1997). Moreover, if a modification would render a reference unsatisfactory for its intended purpose, the suggested modification / combination is impermissible. See MPEP § 2143.01

Generally speaking, Poole teaches a method and system for dynamically constructing web page content. That is, Poole teaches a well-known method for using libraries of content for constructing multiple web pages that may have the same content throughout. For example, a company’s logo may appear at the top

of each web page at a web site or a disclaimer statement may appear at the bottom of each web page. In any case, Poole teaches dynamically providing content and content alone.

The content provided (located in a "Knowledge Base") may be documents, portions of documents, phrases, sentences, words, and characters. See column 6, lines 22-25 of Poole. Further, the Knowledge Base may also contain what Poole calls "document components." A document component, as used in Poole, is simply text or text fragments, *i.e.* more content. See column 6, lines 31-33 of Poole. However, a commonly accepted definition of component in today's computer environment (from the Microsoft Computer Dictionary, 5th Edition) is an object that adheres to generic methods and generic functionality supported by the system into which the component is loaded. Thus, Poole uses the term component in a fundamentally different way than what is recognized in today's programming environment.

Applicants submit that the Office action has failed to establish *prima facie* obviousness as a matter of law with respect to any of the claimed subject matter. Specifically, claim 1 recites accessing the external component for determining a *behavior of the representation* of the element rendered on the page image. As discussed above, Poole simply teaches accessing external *content* for determining what *content* is to be displayed on a page image. That is, claim 1 recites language directed to the manner in which content is displayed whereas Poole simply teaches what content to display. Further, Poole even teaches away from the recitations of claim 1 in that Poole's definition and understanding of a component does not

comport with the generally accepted definition in today's computing environment. That is, Poole can not possibly teach the recitations of claim 1 because Poole shows no appreciation or understanding of an external component, object-oriented programming, or component architectures.

For at least these reasons, applicants submit that claim 1, and dependent claims 2-16, by similar analysis, are patentable over Poole. Applicants submit that claims 2-16 are also allowable for the additional patentable elements included in these claims.

For example, claim 6 recites that the external component comprises an object, and wherein accessing the external component includes instantiating an instance of the object. Clearly, Poole has no appreciation or understanding of the external component being an object as Poole specifically defines the use of "document component" to be text, *i.e.*, content. Further, instantiation refers to the execution of an object; text cannot be instantiated, only displayed. Poole shows no appreciation or understanding of the use of component architecture, instantiation of objects, or object-oriented programming.

As another example, claim 8 recites the external component comprises a COM object, and wherein accessing the external component for determining a behavior of the representation of the other element includes accessing another instance of the object. The Office action acknowledges that Poole does not teach a COM object, but contends that Courts does teach a COM object and the combination of the teachings of Poole and Courts would render the recitations of claim 8 obvious. Applicants respectfully disagree and point out again that Poole

does not show any appreciation or understanding of component architecture or object-oriented programming.

Turning to the next independent claim, claim 17 recites a method of providing dynamic effects to an HTML document, comprising, encapsulating code in an external component for affecting the behavior of elements, including elements of different documents, inserting an element into a document, attaching a reference in the document to associate the element with the external component, and providing the document to a renderer.

The Office action rejected claim 17 as being unpatentable over Poole. More specifically, the Office action contends that Poole teaches inserting an element into a document. Column 3, line 62 to column 4, line 5 of Poole is referenced. Further, the Office action contends that Poole teaches attaching a reference in the document to associate the element with the external component. Column 5, lines 1-14 of Poole is referenced. Next, the Office action contends that Poole teaches providing the document to a renderer. Fig. 3 of Poole is referenced. Finally, the Office action acknowledges that Poole does not teach encapsulating code in an external component for affecting the behavior of elements, including elements of different documents. However, the Office action contends this recitation would have been obvious to a person skilled in the art at the time the invention was made because Poole discloses the knowledge base having different kinds of content that apparently provide enhanced capability for customizing dynamic content in HTML documents. Applicants respectfully disagree, challenge the Office action's unsupported conclusions and respectfully request withdrawal of the §103(a)

rejections of the claims, or specifically request that a reference or references, including the required motivation to combine, be provided demonstrating otherwise. See M.P.E.P. § 2144.03.

As generally shown above, the Office action has failed to establish *prima facie* obviousness as a matter of law with respect to any of the claimed subject matter. Specifically, claim 17 recites an external component for affecting the *behavior of elements*. As discussed above, Poole teaches accessing external *content* for determining what *content* to be displayed in an element on a page image. That is, claim 17 recites language directed to the *manner* in which content is displayed whereas Poole simply teaches *what* content to display. The behavior of an element is not the same as the content of an element.

Further, Poole even teaches away from the recitations of claim 17 in that Poole's definition and understanding of a component does not comport with the generally accepted definition in today's computing environment. That is, Poole can not possibly teach the recitations of claim 17 because Poole shows no appreciation or understanding of an external component, object-oriented programming, or component architectures.

For at least these reasons, applicants submit that claim 17, and dependent claims 18-29, by similar analysis, are patentable over Poole. Applicants submit that claims 18-29 are also allowable for the additional patentable elements included in these claims.

For example, claim 20 recites the external component is a COM object, and wherein accessing the external component includes calling an interface of the

COM object. The Office action acknowledges that Poole does not teach a COM object, but contends that Courts does teach a COM object and the combination of the teachings of Poole and Courts would render the recitations of claim 20 obvious. Applicants respectfully disagree and point out again that Poole does not show any appreciation or understanding of component architecture or object-oriented programming.

Turning to the last independent claim, claim 30 recites in a computer system, a system for rendering page images on a display, comprising an external component encapsulating code for modifying the behavior of elements, including elements of different documents, and a renderer connected to the display for rendering page images, the renderer receiving a document having an element specified therein and information associating the element with the external component, the renderer rendering a page image corresponding to the document and accessing the external component for modifying the page image.

The Office action rejected claim 30 as being unpatentable over Poole. The Office action contends that Poole teaches the recitations of claim 30 and subsequently refers to the rejection of claims 1 and 17 for the specific cites to Poole. As such, the Office action acknowledges that Poole does not teach encapsulating code for modifying the behavior of elements, including elements of different documents. However, as before, the Office action contends this recitation would have been obvious to a person skilled in the art at the time the invention was made because Poole discloses the knowledge base having different kinds of content that apparently provide enhanced capability for customizing dynamic

content in HTML documents. Applicants respectfully disagree, challenge the Office action's unsupported conclusions and respectfully request withdrawal of the §103(a) rejections of the claims, or specifically request that a reference or references, including the required motivation to combine, be provided demonstrating otherwise. See M.P.E.P. § 2144.03.

Again, as shown above, the Office action has failed to establish *prima facie* obviousness as a matter of law with respect to any of the claimed subject matter. Specifically, claim 30 recites an external component encapsulating code for *modifying the behavior of elements*. As discussed above, Poole teaches accessing external *content* for determining what *content* to be displayed in an element on a page image. That is, claim 17 recites language directed to the manner in which content is displayed whereas Poole simply teaches what content to display. To reiterate, the behavior of an element is not the same as the content of an element.

Further, Poole even teaches away from the recitations of claim 17 in that Poole's definition and understanding of a component does not comport with the generally accepted definition in today's computing environment. That is, Poole can not possibly teach the recitations of claim 17 because Poole shows no appreciation or understanding of an external component, object-oriented programming, or component architectures.

For at least these reasons, applicants submit that claim 30, and dependent claims 31-47, by similar analysis, are patentable over Poole. Applicants submit that claims 31-47 are also allowable for the additional patentable elements included in these claims.

In re Application of RAMAKRISHNA et al.
Serial No. 09/316,897

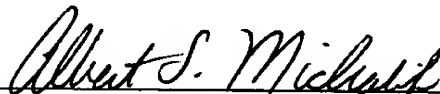
For at least these reasons, applicants submit that all the claims are patentable over the prior art of record. Reconsideration and withdrawal of the rejections in the Office Action is respectfully requested and early allowance of this application is earnestly solicited.

CONCLUSION

In view of the foregoing remarks, it is respectfully submitted that claims 1-47 are patentable over the prior art of record, and that the application is good and proper form for allowance. A favorable action on the part of the Examiner is earnestly solicited.

If in the opinion of the Examiner a telephone conference would expedite the prosecution of the subject application, the Examiner is invited to call the undersigned attorney at (425) 836-3030.

Respectfully submitted,


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